# The Friends of Lewes Society Response to Lewes District Council Issues and Options Consultation July 2021

Friends of Lewes welcomes the opportunity to comment on the Lewes District Council Issues and Options Consultation July 2021. Although Lewes falls within the scope of South Downs National Park planning policy, local plans for areas adjacent to Lewes have a material impact on the town and the Society makes comments in that context.

#### Issue 1: Tackling Climate Change

Friends of Lewes support the target for LDC to become net zero carbon and fully climate resilient by 2030. Whilst the current plans with respect to flooding are supported, the Society considers additional policy measures to manage surface water should be included. Flood risk in Lewes is very dependent of surface water run off management upstream of the Town. Consideration of the impact of urban surface water runoff on infrastructure, transport routes, domestic housing, commercial centres and ultimately the economy needs to be supported by appropriate planning policy. The actions necessary to implement the Ouse Catchment Flood Management Plan should be set out in the plan.

The Society considers urgent action is required to mitigate the adverse impact of additional traffic generated by new developments on the existing infrastructure, both in rural areas and adjacent towns. It agrees with the principles of Model Shift and Modal Shift set out in the consultation. However, this objective will only be met by significant and timely improvements to public transport in rural areas and urgent physical implementation of a walking and cycling infrastructure as set out in the Draft East Sussex Local Cycling and Walking Infrastructure Plan (LCWIP). The objective to achieve net zero carbon 2030 is a little over eight years away and will only be met by significant and timely improvements to public transport in rural areas; urgent physical implementation of a walking and cycling infrastructure as set out in the LCWIP.

Any large allocations in the Low Weald would require significant investment in order to make them sustainable. Without these physical improvements, all new developments in the countryside will have a damaging impact on the environment and make it more difficult for the council to achieve its objective of net zero carbon by 2030.

## Issue 2: Protecting and Enhancing the Quality of the Environment

Biodiversity Net Gain - Friends of Lewes support the requirement to demonstrate achievement of a 10% increase in biodiversity on or near the development site so that habitats for wildlife must be left in a measurably better state than before the development took place. The Society recommends that this includes a requirement to avoid felling of mature healthy trees: since any young replacements will take several years to replicate the ecosystem values of even one mature tree, (e.g., carbon sequestration and storage, oxygen production and improvement in air quality, prevention of water run-off, shelter and shade).

#### Issue 3: Accommodating and Delivering Growth

Friends of Lewes have concerns about the impact of a new settlement within the Low Weald on flood risk downstream. The development of a new settlement of 2,000 to 5,000 homes with associated community infrastructure will result in the loss of open countryside and the increased impermeable urban area created will increase runoff upstream of Lewes. The implementation of major catchment wide surface water management measures will be essential to mitigate the increased risk of flooding downstream.

The Society also considers that the increase in vehicle movements from a single new settlement cannot be accommodated in the existing highway network north of Lewes and would require significant investment in order to make them in any way sustainable.

## Issue 4: Improving Access to Housing

Friends of Lewes fully supports the principle of providing affordable housing in Lewes District.

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Issue 5: Promoting a Prosperous Economy and Building Community Wealth
Environmental constraints limit the provision of employment space within the town and many
people who live in Lewes rely on rely on employment elsewhere in the Lewes District area.
Retention of employment space is therefore important to avoid excessive travel distances to work.
The Society would therefore support policies that seek to retain existing employment space and
encourages new businesses to locate to the area.

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